

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Chapter 13
SYLVIA McKEOWN	:	
	:	Case No. 19-15631 AMC
Debtor.	:	

DEBTOR’S RESPONSE TO MOTION FOR RELIEF FROM STAY

SYLVIA McKEOWN (the “Debtor”), by and through their undersigned counsel, hereby submit this Response to the Deutsche Bank National Trust Company (the “Movant”) for Relief from the Automatic Stay (the “Motion”), and in support thereof respectfully states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Denied.
11. Admitted.
12. Admitted.
13. Admitted.
14. Admitted.
15. Admitted.
16. Admitted.

17. Denied.
18. Matter of law, no answer is required.
19. Admitted.
20. Matter of law, no answer is required.
21. Matter of law, no answer is required.
22. Matter of law, no answer is required.

WHEREFORE, the Debtor respectfully requests this Honorable Court enters an Order denying the Motion for Relief from Stay, and for such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

Dated: February 20, 2024

/s/ Raymond Kempinski

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